

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	WC Docket No. 17-97
Call Authentication Trust Anchor	)	

**REPLY COMMENTS OF ZIPDX LLC  
THIRD FURTHER NOTICE OF PROPOSED RULEMAKING**

As expected, most commenters have expressed concern about the impact of a shortened extension period on their own businesses (or that of those that they represent). Generally, the parties submitting comments are, to the best of our knowledge, NOT responsible for facilitating any sizable number of illegal robocalls.

What is pertinent here is the elephant NOT in the room. It is the perspective of ZipDX that the vast majority of illegal robocalls are facilitated by a relatively small number of providers – dozens at any given point in time. They are not participating in this conversation, obviously. Literally thousands of other providers are ensnared in well-intentioned mitigation efforts despite their lack of involvement in the laundering of illegal robocalls.

In adjusting the qualifiers for STIR/SHAKEN compliance extension, the Commission’s challenge is to maintain the target on those enabling the unlawful calls without putting further burdens on those that are not. By and large, the former group is not facilities based; they receive call initiations in SIP format over the public internet. We saw in the comments no concerns regarding the FNPRM suggestion, at ¶35, that the extension be restricted to those that provide service over their own facilities. NTCA-The Rural Broadband Association (p. 2) and ACA Connects (p. 10) both embraced this notion explicitly in their comments.

The facilities-based distinction seems clear-cut versus the subscriber line count or even “mass market revenue” criteria, which are especially problematic in the context of the small set of providers that need to be the focus of tightened compliance.

Recent FCC regulations require that even if granted an extension, a provider still must work to mitigate illegal calls. It remains to be seen whether STIR/SHAKEN compliance will reign in the bad behavior of that small facilitating group, or whether they will co-opt call authentication in a way that lets them continue their nefarious endeavors.

Regardless, we believe that every tool in the toolbox should be leveraged to get high-volume illegal calling off our network. Our collective goal should be to prevent these calls from ever initiating their journey towards Americans (or stopping them at our borders if foreign-sourced). That means biasing our efforts towards those that are today the most prolific facilitators and putting disincentives in front of others that might be tempted to fill their shoes.

We recognize that many providers are on the sidelines of this battle. They do not initiate illegal calls so they are not in a position to have a big impact and should not be over-burdened with shortened compliance mandates. On the other hand, as suggested in FNPRM ¶33, the FCC should have the discretion to rapidly constrain a provider that is KNOWN, via traceback or other means, to be a facilitator of these calls – by, for example, eliminating their STIR/SHAKEN compliance extension. We saw in the comments no objections to this notion and recommend that a history of no illegal-call tracebacks and no warning letters be prerequisites for any extension.

Respectfully submitted,

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